

**Mid-Hudson Data Corp, Inc.**

200 Jefferson Heights

Catskill, NY 12414

Wednesday, November 23, 2005

Marlene H. Dortch

Office of the Secretary

Federal Communications Commission

445 12<sup>th</sup> Street, SW

Washington, DC 20554

**RE: Letter of VOIP Compliance (WC Docket No. 05-196)**

**Dear Mrs. Dortch,**

In compliance with the FCC E911 order I am writing to inform you of our status and plans to fulfill the requirements with regard to E911. We understand the urgency of deploying this critical service to all of our users as soon as possible and I want to assure the FCC that we have been working diligently to attain full compliance by engaging multiple providers to find the best possible solution at the earliest possible date.

Currently we have selected Telefinity Dash 911 to assist us with a solution. By working with Telefinity Dash 911 in conjunction with Intrado we feel will not only meet the requirements of the FCC E911 order but more importantly we believe this solution will offer our users the safest solution currently available in our region. Please find the details of our plan outlined in the following paragraphs. In addition we have also attached two maps from Intrado in .PDF format that can be enlarged to show specific PSAP rollout information.

- **911 Solution:**

The VoIP service provided by Mid-Hudson Data Corp, Inc. (MHDC) utilizes Telefinity Dash911's V9-1-1™ solution to facilitate 9-1-1 call termination. This solution achieves 9-1-1 coverage to 100% of subscribers in compliance with the rules establish in the VoIP 911 Order. Currently, 89% of subscribers are served by PSAPs operating off an E9-1-1 Selective Router. The remaining 11% are in areas pending Selective Router connectivity targeted for deployment at the end of Q2 2006. These areas will have Basic 9-1-1 service, but are not included within the Federal Communications Commission's (FCC) Order and are therefore not required for compliance.

The V9-1-1™ solution enabled by Telefinity Dash911 through Intrado provides a true E9-1-1 solution for VoIP Service Providers (VSP). The solution provided by the Telefinity Dash911 affiliation with Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for the VSP is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Specifically, Intrado manages the VPC functionality and the Call Delivery component on behalf of Telefinity Dash911 thereby enabling VSPs to take advantage of a full end-to-end solution from one E9-1-1 service provider.

The only VSP requirements for delivery of the V9-1-1™ service are the ongoing delivery of address and telephone number information to Telefinity Dash911 via a real-time interface and the PSTN connectivity to the Telefinity Dash911 network to enable live 9-1-1 call delivery. The real-time interface is via a SOAP API programming interface supplied by Telefinity Dash911 to its VSP customers, or, a branded website interface provided by Telefinity Dash911 to its VSP customers.

- **911 Routing Information/Connectivity to Wireline E9-1-1 Network:**

All 9-1-1 calls are transmitted “to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E9-1-1 Network as are necessary in those areas where Selective Routers are utilized” using the Telefinity Dash911 V9-1-1™ solution. Through this, we will have access to 154 E9-1-1 Selective Routers by November 28<sup>th</sup>, 2005. Beyond that, the attached “Major Market Deployment Map” and the “VoIP Deployment Plan” reflect the major market deployment schedules. Note: the market deployment map represent major markets where Intrado has reported to Telefinity Dash911 that it has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.

- **Transmission of ANI and Registered Location Information:**

Currently 80% of the PSAPS within MHDC's coverage area is capable of receiving and processing ANI and Registered Location information. As of the Filing of this letter we are not able to pass any ANI to these PSAPS as our providers Telefinity/Intrado are not allowing live calls. We are under contract and expect that prior to November 28<sup>th</sup>, 2005 we will indeed be passing ANI and registered location information to the PSAPS for 89% of our subscriber base and 11% of our subscriber base will be sent via the 911 voice only solution until Q1 2006.

- **911 Coverage**

- **Deployment Overview**

The Telefinity Dash911 E9-1-1 solution uses Intrado as a backbone supplier and as such Intrado is the VPC and is working on nationwide native VoIP E9-1-1 delivery in accordance with the Commission Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on the VSP customer subscriber base priorities. The attached “Major Market Deployment Map”, which corresponds with MSAs, identifies regions within our subscriber territory that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. Telefinity Dash911 has advised us that these areas are planned for deployments by November 28, 2005; March 31, 2006 and June 30, 2006. This intention of this map is to demonstrate FCC compliance for the November 28th requirements and the future deployment strategy.

- **Obtaining Initial Registered Location Information:**

Since initial deployment of the MHDC VoIP service on November 3rd, 2005, 100% of subscribers have been required to submit and validate their Registered Location before service can be activated. Activation is completed through an online management website after the subscriber receives the VoIP device.

Addresses are then submitted to Telefinity Dash911 and are subjected to an immediate screening against the US Postal Service Street Address Guide in order to immediately determine if the submitted address is a valid address. This ensures seamless delivery of acquired registered location information to the Intrado systems.

- **Obtaining Updated Registered Location Information:**

Telefinity Dash911, as part of our total 9-1-1 solution, provides at least one way of updating each subscriber's Registered Location. As a component of the Telefinity Dash911 Service we have access to a near real-time address update system provided to us by Telefinity Dash911. This allows us to have near real-time delivery of the subscriber's address and also allows us as a VSP to submit a subscriber's address update information directly. The system allows us to have the subscriber input his initial address into the system at the time of initially signing up for our VoIP service. Addresses submitted are subjected to an immediate screening against the US Postal Service Street Address Guide in order to immediately determine if the submitted address is a valid address. VSPs may integrate VUI into their existing provisioning systems to ensure seamless delivery of acquired registered location information to the Intrado systems.

Subscribers have more than one option to input, update or change their address. Subscribers can easily and quickly update their Registered Location by either (a) online via our website, or (b) contact us by phone and ask for an operator who will make the address change while the customer is on the phone.

At the time of an emergency VoIP 9-1-1 call, Telefinity Dash911 passes the call directly to Intrado's call routing system. Intrado's call routing system uses the customer's provisioned information to associate the latitude and longitude assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid Address and Call Back Number of the user.

Telefinity Dash911 also offers to us, as a VSP a newly-released product called "Level of Service (LoS) Query" that we can choose to integrate into our application. This functionality enables us to make a real-time query with an address of a customer/end user for the purpose of determining the level of 9-1-1 service available to that customer based on their location. Intrado will return a set of responses (Enhanced, Basic, etc.) that will enable us or our user to determine the level of 9-1-1 service available at that address and take appropriate action.

- **Technical Solution for Nomadic Subscribers:**

As a VSP using Telefinity Dash911's V9-1-1™ for VoIP service, we are able to route VoIP emergency calls from our VoIP network to Telefinity Dash911's Intrado Network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 9-1-1 infrastructure. The Services utilized provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V9-1-1™ solution enables full support of nomadic usage of VoIP provided the user updates their address information upon connecting to the Internet at a new location/address. Through the MHDC VoIP management website interface, which is integrated with Telefinity Dash911, the 9-1-1 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly-provisioned address and make available (assuming no errors) that

particular user's information for delivery to the PSAP within an average of 15 minutes of receipt of the new Registered Location address information.

We recognize the universal desire to remove the user interaction and self-provisioning component of the current 9-1-1 solution. To that end, we understand that Telefinity Dash911, along with Intrado, is actively working on a number of "location determination" technologies.

As you can see we are working closely with our partners to provide the best possible solution that we can. We will continue to follow the industry and provide the most up to date and safest solutions as they become available.

Please contact me if you should have any questions.

Yours truly,

Stephen M. Renault  
Vice President  
Mid-Hudson Data Corp, Inc.  
stephenr@mid-hudson.com  
518-943-6653